

REMARKS

Claims 1-3, 7, 9, 10, 14-19, 23 and 24 remain pending. Claims 1, 16, and 17 have been amended. Claims 4-6, 11-13, and 20-22 were withdrawn in response to a Species Election. Claims 25-43 were withdrawn in response to Genus Election. Applicants wish to thank Examiner Bergin for granting an interview on April 11, 2003 to discuss the rejection of claim 1 in view of existing systems such as lycos.com. In that interview, Applicants described the present invention, the operation of lycos.com and similar systems, and novel differences between the claimed invention and these systems.

Claim Rejections Under 35 U.S.C. § 112

Claims 1-3, 7, 9, 10, 14-19, 23, and 24 were rejected under 35 U.S.C. § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicants regard as the invention.

In view of the interview with the Examiner, the claims have been amended to replace the language of these claims with language to indicate that the association of the said web sites is updated to reflect the addition of the newly created web site within the collection of web sites.

Accordingly, reconsideration and withdrawal of the rejection of 1-3, 7, 9, 10, 14-19, 23, and 24 under 35 U.S.C. § 112 is respectfully requested.

### Claim Rejections Under 35 U.S.C. § 103(a)

Claims 1, 2, 3, 7, 9, and 16-18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over PCT Patent No. WO 98/04088 to Bonnaure et al. ("Bonnaure") and "A Proposal for a Geographic-Based Address Structure for IPv6" to Ye ("Ye"). Claims 10, 14, 15, 19, 23 and 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bonnaure, Ye and further in view of U.S. Patent No. 5,032,989 to Tornetta ("Tornetta").

In view of the interview with the Examiner, the pending independent claims have been amended to recite that a plurality of web-sites "at [the] first computer system" are created from information collected at that computer system. Each web-site is addressable by a URL and is identified by a physical location. One of the web-sites is assigned to a user and links to web-sites "other than [the] user web-site" are selected for presentation on the user's web-site based on a relationship between the physical locations identified by the user web-site and the other web-sites. These features are neither shown nor suggested by Ye, Bonnaure, nor Tornetta references.

Based on the interview, it is believed that the claims define an invention that is not obvious in view of these references. Applicants re-present their arguments concerning these references below:

Ye describes a mechanism for encoding the geographic location of a system into an IPV6 address. The purpose of Ye's work is to improve routing within the network by permitting routers to use the geographic location of the machine along with the geographic location of the router to determine which next hop router is in the correct direction. After completely describing this encoding scheme, Ye then states that each of the machines must be assigned the IPV6 address of

the router to which they are connected for this approach to routing to work. In all cases, Ye is taking the geographic location of a physical entity and mapping that geographic location into an Internet Protocol addressing entity.

Bonnaure describes a mechanism for establishing secure connections between a WEBTV server and a WEBTV client using a multi-step process. In this process, the WEBTV client calls an 800 number to connect to a first server. This first server uses the ANI (Caller ID) information to determine where the client is located from a phone dialing perspective, not a physical location perspective. It then uses a database of phone numbers to determine the best phone number to call for the user's connection based on a set of criteria like time-of-day and phone exchange. At the same time, it generates an encryption key for the client to use for the subsequent transmission. This first call is then ended. The client then connects using the new phone number and establishes an encrypted session to the WEBTV server. Once at the WEBTV server, there is mention that the WEBTV server might tailor information presented to the client based on knowledge of the phone number the client used to establish the connection.

To assist in understanding differences between the claimed invention and the cited references, some terms should be defined.

"Universal Resource Locator" (URL) as defined in RFC 1738 is a string of characters made up of the following components:

<scheme>:<scheme-specific-part>

The general format for a <scheme-specific-part> is //<user>:<password>@<host>:<port>/<url-

}

<path> in which the <user>:<password>@ is often omitted along with the :<port>.

<host> may either be a domain name server (DNS) defined name or an IP address. When specified as a DNS name, it is mapped to one or more IP addresses. Eventually, this <host> points to a single physical computer that will provide the requested resource.

"Web site" is a collection of web pages, each web page having a unique URL. All pages within a web site have an identical initial <scheme-specific-part> differing only in the final parts of the <url-path>.

"Link" is a reference to a web page from another web page.

One physical machine may (and often does) support multiple web sites.

A concept recited in the pending claims relates to the establishment of links on web pages based on geographic proximity of the information content represented by the web sites to each other. In one example, this is done by identifying each web site by a geographic location. For example, one web site has associated with it the coordinates of 41.327113, -073.828090. These coordinates are not encoded and placed within the IP address for the server or even within the URL for the web site. They are kept in a pair of columns within a database that contains all of the information for this web site and many others.

Using this coordinate, when particular pages are displayed on this web site, links are

generated on this web site that point to web pages on other web sites that have been identified by a geographic location near the geographic location identified by this web site.

Ye's example showed encoding locations of physical entities into IP addresses. Ye's whole premise is based on location of a physical entity and has nothing to do with cyberspace. Bonnaure once again is dealing with solving physical problems, not cyberspace mapping. Bonnaure relates to mapping cyberspace entities into the physical world and associating one cyberspace entity with another based on how they are mapped into the physical world. Moreover, taking Ye in connection with Bonnaure would not lead one to the claimed invention.

Nowhere in the cited references is it taught or suggested that web-sites, each with a URL, are each identified by a physical location. Moreover, nowhere in the cited references is it taught or suggested to present links to a web-site based on the relationship between the physical locations assigned to them.

In view of the amendments to claims 1, 16 and 17, and the remarks above, reconsideration and withdrawal of the rejection of 1-3, 7, 9, 10, 14-19, 23 and 24 under 35 U.S.C. § 103(a) is respectfully requested.

## **CONCLUSION**

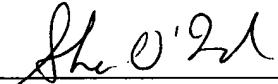
For all the above reasons, the Applicant respectfully submits that this application is in condition for allowance. A Notice of Allowance is earnestly solicited.

The Examiner is invited to contact the undersigned at (202) 220-4255 to discuss any matter concerning this application. The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 11-0600.

Respectfully submitted,  
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Dated: August 11, 2002

By:

  
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